| 1  | RENE L. VALLADARES Federal Public Defender   |   |  |
|----|--|---|--|
| 2  | State Bar No. 11479 BRIAN PUGH   |   |  |
| 3  | Assistant Federal Public Defender Law Office of the Federal Public Defender                    |   |  |
| 4  | 411 E. Bonneville Avenue, Suite 250<br>Las Vegas, Nevada 89101<br>(702) 388-6577/Phone         |   |  |
| 5  | (702) 388-6261/Fax<br>Brian_Pugh@fd.org  |   |  |
| 6  | Attorney for Karen Chapon  |   |  |
| 7  | UNITED STATES DISTRICT COURT   |   |  |
| 8  | DISTRICT OF NEVADA   |   |  |
| 9  | -0   | Oo-   |  |
| 10 | UNITED STATES OF AMERICA,  | ) Case No: 2:20-cr-286-JCM-NJK                    |  |
| 11 | Plaintiff,   | )<br>SIXTH STIPULATION TO MODIFY                  |  |
|    | vs.  | ) CONDITIONS OF RELEASE )                         |  |
| 12 | KAREN CHAPON,  |   |  |
| 13 | Defendant.   |   |  |
| 14 |  | )   |  |
| 15 | IT IS HEREBY STIPULATED AND  | AGREED, by and between Christopher Chiou          |  |
| 16 | Acting United States Attorney, and Jessica Oliva, Assistant United States Attorney, and Rene L |   |  |
| 17 | Valladares, Federal Public Defender, and Brian Pugh, Assistant Federal Public Defender, counse |   |  |
| 18 | for Karen Chapon, that Ms. Chapon's pretrial release travel condition be amended to allow Ms   |   |  |
| 19 | Chapon to travel to California as outlined below.  |   |  |
| 20 | This stipulation is entered into for the following reasons:                                    |   |  |
| 21 | 1. Ms. Chapon needs to travel to C   | California occasionally for work and to help care |  |
| 22 | for her elderly mother.  |   |  |
| 23 | 2. The parties agree that Ms. Chapon will be permitted to travel to California for             |   |  |
| 24 | work and other purpose, but only with prior approval from pretrial services.                   |   |  |

| 1  | 3. Ms. Chapon's Pretrial Services Officer does not oppose this modification to her            |  |
|----|---|--|
| 2  | release conditions.   |  |
| 3  | Dated this 11 <sup>th</sup> day of March 2022.  |  |
| 4  | RENE L. VALLADARES  Federal Public Defender  Christopher Chiou  Acting United States Attorney |  |
| 5  | By <u>/s/ Brian Pugh</u> BRIAN PUGH By <u>/s/ Jessica Oliva</u> JESSICA OLIVA                 |  |
| 7  | Assistant Federal Public Defender Assistant U.S. Attorney                                     |  |
| 8  | ORDER   |  |
| 9  | IT IS SO ORDERED.   |  |
| 10 | Benbucken   |  |
| 11 | BRENDA WEKSLER United States Magistrate Judge   |  |
| 12 |   |  |
| 13 | DATED:  |  |
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